

Port & Sava
303 Merrick Road, Suite 212
Lynbrook, NY 11563
(516) 352-2999
Janine Z. Schatz, Esq.
Counsel for the Defendant Amos Financial LLC

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
WINDWARD BORA, LLC,

Case No.: 1:20-cv-2929-WFK-MMH

Plaintiff,

- against -

DEAN HOLDING LLC, LEROY M. FREDERICK,
JR., AMOS FINANCIAL LLC, HAREL GROUP
INVESTORS LLC, NEW YORK STATE
DEPARTMENT OF TAXATION AND FINANCE,
AM TRUST BANK, CITY OF NEW YORK
DEPARTMENT OF TRANSPORTATION
PARKING VIOLATIONS BUREAU, CITY OF
NEW YORK ENVIRONMENTAL CONTROL
BOARD, NEW YORK CITY DEPARTMENT OF
HOUSING PRESERVATION & DEVELOPMENT,
“JOHN DOE” and “JANE DOE,” the last two names
being fictitious, said parties intended being tenants or
occupants, if any, having or claiming an interest in, or
lien upon, the premises described in the complaint,
Defendants.

-----X

DEFENDANT AMOS FINANCIAL LLC’S RULE 26 EXPERT DISCLOSURE

Pursuant to Fed. R. Civ. P. 26(a), and in accordance with the court’s scheduling order,
Defendant Amos Financial LLC (hereinafter “Amos”), has retained and designates as their
expert witness:

Ruth Brayer, Certified Forensic Document Examiner
Brayer Handwriting International
249 East 48th Street

New York, NY 10017
info@antiforgery.com

I. Qualifications & background

Ms. Brayer's qualifications include extensive training with the National Bureau of Document Examiners (NBDE) as well as certifications from the National Association of Document Examiners (NADE) and the International Association of Document Examiners (IADE). She is the author of Detecting Forgery in Fraud Investigations: The Insider's Guide (ASIS, 2000) and What You Don't Know About Forgery Can Cost Your Case (2021).

Attached please find Ms. Brayer's full curriculum vitae, detailing the entirety of her qualifications and experience, including a list of previous cases in which she testified.

II. Compensation

In exchange for her services Ms. Brayer has been compensated in the amount of \$2,312.50.

III. Contents of Report & Testimony

At issue in this matter is a \$144,000.00 mortgage ("the loan") issued by Home Funds Direct to a Leroy Frederick, Jr., and allegedly transferred to other parties through a series of assignments. Ms. Brayer examined an Allonge to Note associated with the loan, purportedly signed by a Clarence Wells of Home Funds Direct, and compared the signature to several known signatures of Mr. Wells. She determined, in accordance with the guidelines developed by The Scientific Working Group for Forensic Document Examination, that there are significant fundamental differences between the signature on the Allonge to Note and the known signatures.

Hence, she is prepared to testify with a reasonable degree of certainty that the signature on the Allonge to Note and the known signatures were not executed by the same individual.

Dated: Lynbrook, New York
June 3, 2022

PORT & SAVA

/s/ Janine Z. Schatz
By: Janine Z. Schatz, Esq.
Attorneys for Defendant
Amos Financial LLC
303 Merrick Road, Suite 212
Lynbrook, NY 11563
(516) 352-2999
janine@portandsava.com

CERTIFICATE OF SERVICE

I hereby certify that on June 3, 2022, a copy of the foregoing Notice of Expert Disclosure Pursuant to Fed.R.Civ.P. 26(a)(2)(B) was electronically filed through the court's ECF system, which caused a copy to be served upon all counsel of record.

/s/ Janine Z. Schatz
By: Janine Z. Schatz, Esq.
PORT AND SAVA
Attorneys for Defendant
Amos Financial LLC
303 Merrick Road, Suite 212
Lynbrook, NY 11563
(516) 352-2999
janine@portandsava.com